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July 22, 2016

Via Electronic Delivery

Mr. Doug Tomchuk
Remedial Project Manager—Central New Jersey Remediation Section
U.S. Environmental Protection Agency, Region II
290 Broadway
New York, NY 10007-1866

**Re: Remedial Investigation Report Addendum, Universal Oil Products, Operable Unit 2,
East Rutherford, New Jersey**

Dear Mr. Tomchuk:

Honeywell International Inc. ("Honeywell") is pleased to submit the enclosed Remedial Investigation Report Addendum ("RIR Addendum") for Operable Unit 2 of the Universal Oil Products Site ("Site") in East Rutherford, NJ. The RIR Addendum was developed in full compliance with the requirements of CERCLA and includes updates to the ecological and human health risk assessments.

The RIR Addendum reflects additional data collection and site activities conducted since 2011, including a Non-Time-Critical Removal Action (NTCRA) performed in 2012 and 2013 in the Streamlands area. As is discussed in greater detail in this submittal, the data collected following the NTCRA demonstrate the effectiveness of that action and show the ongoing recovery of the marshes since 2012. The RIR Addendum also presents refinements to the established Conceptual Site Model that further supports Honeywell's remedial approach.

We believe the data and analysis contained in this submittal characterizes the marshes and waterways at the Site to an extent sufficient to set the stage for development of a phased remedial approach utilizing the principles of adaptive management. The RIR Addendum shows positive trends in the recovery of the marsh areas and indicates that monitored natural recovery (MNR) should be strongly considered as a remedial strategy for the marshes. Accordingly, the RIR Addendum supports the discussions we have had with the Agency regarding a Feasibility Study that would include remediating contamination in the sediments in the waterways west of Murray Hill Parkway and recommending MNR for the marshes. Continued MNR-related monitoring and data collection to further support this approach is anticipated. The initial action to address the waterways will further expedite the recovery of the marshes and will allow an evaluation of whether or to what extent further remediation of the marshes is needed in a subsequent remedial stage.

We look forward to your review of this submittal and further collaboration with EPA to expedite the efficient and protective remediation of the UOP site.

Sincerely,



Richard W. Galloway
Design & Construction Manager

Enclosures

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